

IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF PENNSYLVANIA

LEE PRESTON LUNDY,  
Plaintiff

v.

CITY OF PHILADELPHIA,  
Defendant

&

PHILADELPHIA POLICE OFFICER  
ROBERT BONDS JR.,  
Defendant

&

PHILADELPHIA POLICE COMMISSIONER,  
DANIELLE M. OUTLAW,  
Defendant

CIVIL ACTION

NO: 2:23-CV-000807

PLAINTIFF'S MOTION TO COMPEL DISCOVERY PURSUANT TO LOCAL RULE 26.1 B

TO THE HONORABLE JUDGES OF THE SAID COURT:

The within Plaintiff's Motion to Compel Discovery Pursuant to Local Rule 26.1(B), on behalf of the Plaintiff, Lee Preston Lundy, by and through his attorney, Earl D. Raynor Jr., Esquire, respectfully represents the following:

1. On March 2, 2023, the Plaintiff, Lee Preston Lundy, filed a civil rights action brought under the Fourth, Fifth, Eighth and Fourteenth Amendments to the United States Constitution, specifically brought under 42 U.S.C. Section 1983 and raising supplemental state law claims concerning the actions of Defendant, Philadelphia Police Officer Robert Bonds Jr., arresting the Plaintiff, Lee Preston Lundy and charging him with Megan's Law Failure to Register, 18 Pa.C.S.A. Section 4915(a)(1), Megan's Law Failure to Verify, 18